

REMARKS/ARGUMENTS

Claims 1-40 are pending in the present application, with claims 15-17, 32-34, and 38-40 currently withdrawn. No claims have been added, amended or cancelled. Reconsideration of the claims is respectfully requested.

I. 35 U.S.C. § 103, Obviousness (Claims: 1-14, 18-31, and 35-37)

The Office Action rejects claims 1-14, 18-31, and 35-37 under 35 U.S.C. § 103 as being unpatentable over *Liming et al.*, System and Method Providing a Spatial Location Context, U.S. Patent Application Publication 2002/0055924, May 9, 2002 (hereinafter “*Liming*”) in view of *Hougaard et al.*, Geographic-Based Information Technology Management System, U.S. Patent No. 6,216,130, April 10, 2001 (hereinafter “*Hougaard*”). This rejection is respectfully traversed.

Regarding Claim 1, the Office Action States:

Liming discloses a method for management of a distributed data processing system, the method comprising:

Determining a unique network hardware identifier for a network device (Paragraphs 73-74; 99-100; and 156-159);

Associating the unique network hardware identifier with geographic location information (Paragraphs 73-74; 99-100; and 156-159); and

Managing the network in accordance with the geographic location information (Paragraphs 156-162);

But does not explicitly disclose configuring the network device in accordance with the geographic location information through a network administrative user interface.

Hougaard, however, configuring the network device in accordance with the geographic location information through a network administrative user interface (Column 5; line 32 to Column 6, line 19; and Column 7, lines 1-62). It would have been obvious to one of ordinary skill in the art at the time of applicant's invention to incorporate the geographic-based management system of *Hougaard* into the location-based network system of *Liming* in order to allow the system of organize geographic information located at remote sources in such a way that it is easily accessible and displayable to users, facilitate the exchange and distribution of geographic information to multiple users within an organization, and/or to allow an administrator to specify which users are authorized to access, modify, or delete geographic information through filters.

Office Action dated April 13, 2007, pp. 2-3.

Independent claim 1, which is representative of claims 18 and 35, is as follows:

1. A method for management of a distributed data processing system, the method comprising:

determining a unique network hardware identifier for a network device;

associating the unique network hardware identifier with geographic location information; and
configuring the network device in accordance with the geographic location information through a network administrative user interface.

No *prima facie* obviousness rejection of claim 1 can be stated in view of *Liming* and *Hougaard* because neither *Liming* nor *Hougaard*, either alone or in combination teaches the features of claim 1. The Examiner bears the burden of establishing a *prima facie* case of obviousness based on prior art when rejecting claims under 35 U.S.C. § 103. *In re Fritch*, 972 F.2d 1260, 23 U.S.P.Q.2d 1780 (Fed. Cir. 1992). All limitations of the claimed invention must be considered when determining patentability. *In re Lowry*, 32 F.3d 1579, 1582, 32 U.S.P.Q.2d 1031, 1034 (Fed. Cir. 1994). The scope and content of the prior art are... determined; differences between the prior art and the claims at issue are... ascertained; and the level of ordinary skill in the pertinent art resolved. Against this background the obviousness or non-obviousness of the subject matter is determined. *Graham v. John Deere Co.*, 383 U.S. 1 (1966). Often, it will be necessary for a court to look to interrelated teachings of multiple patents; the effects of demands known to the design community or present in the marketplace; and the background knowledge possessed by a person having ordinary skill in the art, all in order to determine whether there was an apparent reason to combine the known elements in the fashion claimed by the patent at issue. *KSR Int'l. Co. v. Teleflex, Inc.*, No. 04-1350 (U.S. Apr. 30, 2007). Rejections on obviousness grounds cannot be sustained by mere conclusory statements; instead, there must be some articulated reasoning with some rational underpinning to support the legal conclusion of obviousness. *Id.* (citing *In re Kahn*, 441 F.3d 977, 988 (CA Fed. 2006)).

A *prima facie* obviousness rejection cannot be stated because the proposed combination of the references does not teach or suggest all the features of claim 1. Specifically, neither *Liming* nor *Hougaard*, either alone or in combination, teach or suggest the feature of **configuring the network device in accordance with the geographic location information through a network administrative user interface**. The Office Action admits that *Liming* does not teach this feature. (See Office Action dated April 13, 2007, p. 3.) However, the Office Action points to *Hougaard*, column 5, line 32 to column 6, line 19 and column 7, lines 1-62, which are reproduced below for the Examiner's convenience, as allegedly teaching this feature:

FIG. 1 provides an overview of the architecture of one embodiment of the systems of the invention. In this embodiment, the system includes an administrator application 10 whereby an administrator organizes information referencing geographic and other data structures available at remote data sources. The user application 20 accesses the reference information generated by administrator application 10 and retrieves and displays the geographic and other data structures located at the remote sources.

Administrator application 10 is executed at a administrator system 11, while user application 20 is executed at a user system 21. Administrator system 11 and user system 21 may each be a separate computer or computer system. For example, administrator system 11 may be embodied in a server computer, while user system 21 may be embodied in a client computer in a network environment. In this configuration, multiple users may have access to the information compiled by administrator application 10 using a plurality of user applications 20, each installed on a separate client computer. Alternatively, administrator system 11 and user system 21 can be embodied in a single computer. The invention extends to systems wherein administrator application 10 and user application 20 are program modules of a single application program executed on one computer.

As shown in FIG. 1, the systems of the invention enhance the usability and accessibility of disorganized data sources 30, which may be located anywhere in the world. A GIS administrator uses administrator application 10 to identify, from disorganized data sources 30, the information that is of interest to individuals within the organization that is to be served by the systems of the invention. For example, the administrator may browse or otherwise search the Internet via network infrastructure 44. The disorganized data sources 30 may include geographic data 12, tabular data 14, application programs 16, and other data 18, such as graphical images, video, and audio. Depending on the interests of users within the organization, the administrator may choose to identify any number or type of data structures from disorganized data sources 30.

In one example, the organization to be served by the system of FIG. 1 may be a public utility. In this case, the geographic data 12 may represent maps of the region served by the public utility, including municipal boundaries, streets, and information relating to the physical infrastructure of the public utility. Tabular data 14 may include customer lists, while applications 16 may be software for displaying the geographic data and tabular data to users. Other data 18 may be any type of information that further pertains to the infrastructure or services provided by the public utility. Of course, the system of FIG. 1 may instead be used by essentially any other type of organization, and the data structures at the disorganized data sources 30 may be any type of data deemed to be of importance to the particular organization.

By compiling data references 22, the administrator establishes an index of useable data structures located at disorganized data sources 30 and makes the index available to any desired number of users in the organization. Referring again to the example of a public utility, the administrator can organize data references 22 to allow customer service representatives, maintenance dispatchers, and other interested users to conveniently retrieve and view the geographic information likely to be of importance to the public utility. In the absence of data references 22 and other information stored by administrator application 10, individual users in the organization would be required to locate and organize the geographic data 12 and other data structures, thereby engaging in inefficient duplication of effort.

In addition to merely locating referencing data structures 12, 14, 16, and 18, the administrator application 10 allows an administrator to establish relationships

between various data structures or combinations of data structures. To illustrate the concept of establishing relationships between data structures, an administrator in a public utility may identify three data structures. A first geographic data structure may include an encoded map of the streets, municipal boundaries, and other features of a portion of the geographic region of service of the public utility. A second geographic data structure may include, for example, a representation of the infrastructure of the public utility. A tabular data structure may list customers of the public utility along with the customers' addresses. The administrator, in this example, decides that users within the public utility would be interested in viewing a map wherein the images of the two geographic data structures are combined. Moreover, the administrator may determine that users in the public utility would be interested in viewing or otherwise using the tabular customer data when viewing the map associated with the two geographic data structures.

In order to facilitate the combined use of the two geographic data structures and the tabular data structure, the administrator can specify the relationship between the data structures in relationship information 32. A detailed description of one technique for organizing and establishing relationships between data structures is presented below in reference to FIG. 2.

Referring to FIG. 1, the administrator application 10 also compiles other information that allows users to access the appropriate data indexed by data references 22. The administrator can configure context filters 34, which permits the users to receive only the geographic and other data that is relevant to them at that time that the requests for data are made. The administrator can also configure user access filters 36, which constitute a security mechanism for allowing only authorized users to access the geographic and other data. The administrator can compile application specific data 38, which specify application specific paths or mode information required to display tabular data or other types of data. The application specific data 38 allow tabular and other data to be conveniently displayed to the user without the user having to manually specify the application specific paths or mode information. In summary, the information compiled by the administrator using administrator application 10 organizes data structures 12, 14, 16, and 18 located at disorganized data sources 30 in a manner to make them accessible to users of the system of FIG. 1.

The passage of *Hougaard* in column 5, line 32 to column 6, line 19, does not teach the feature of **configuring the network device in accordance with the geographic location information through a network administrative user interface**. Rather, the column 5, line 32 to column 6, line 19 passage of *Hougaard* teaches organizing geographic data gathered from disparate sources. Configuring a network device in accordance with geographic location information means altering or performing some function on the device or some function of the device based on the location of the device. The Specification lists several examples of this type of functionality. Page 90, line 21 through page 92, line 7, of the Specification is a passage that describes several examples of configuring the network device in accordance with the geographic location information through a network administrative user interface .

For example, a user may be granted access based to a network or portions of a network based on the geographic location of the user. That is, a user in one region may be granted access to only a portion of a network because of the geographic area the device is located in when the device accesses the network.

Another example of configuring a network device in accordance with the geographic location information through a network administrative user interface includes the distribution of software to device within the network based upon the geographic information associated with each device. For example, devices within some networks may require software that is specifically configured for a device depending on its geographic location. For example, an ISP may be required to provide certain functionality within a given geographic region.

As another example, a user may desire to update all the data processing systems with a network with the newest revision of certain software packages. However, the newest revision of a software application may comprise multiple versions that are individually configured for different geographic regions. For instance, a corporate customer may desire that the accounting departments throughout an enterprise have the latest revision of a software application that computes taxes in accordance with the tax laws of a given geographic region, which might require special software modules, tax forms, etc., for each geographic region.

The passage of *Hougaard* in column 5, line 32 to column 6, line 19 merely teaches organizing data for the easy use and retrieval by a user. However, the passage does not teach **configuring the network device in accordance with the geographic location information through a network administrative user interface**. In fact, the passage of *Hougaard* in column 5, line 32 to column 6, line 19 makes no mention of configuring either a network or network devices. Accordingly, the passage of *Hougaard* in column 5, line 32 to column 6, line 19, fails to suggest the feature of **configuring the network device in accordance with the geographic location information through a network administrative user interface**.

The passage of *Hougaard* in column 7, lines 1-62, also fails to teach the feature of **configuring the network device in accordance with the geographic location information through a network administrative user interface**. Rather, the passage of *Hougaard* in column 7, lines 1-62 teaches that an administrator can compile data and establish an index of useable data structures located at disorganized locations. This information is then made available to the users. Additionally, the administrator can establish relationships between various data structures or combinations of data structures. As stated in column 7, lines 58-62, “In summary, the information compiled by the administrator using administrator application 10 organizes data structures 12, 14, 16, and 18 located at disorganized data sources 30 in a manner to make them accessible to the users of the system in FIG. 1.” (emphasis added) Therefore, the passage of *Hougaard* in column 7, lines 1-62, fails to teach the feature of **configuring the network**

device in accordance with the geographic location information through a network administrative user interface. Furthermore, the passage of *Hougaard* in column 7, lines 1-62 does not mention configuring either a network or network devices. Accordingly, the passage of *Hougaard* in column 7, lines 1-62 fails to suggest the feature of **configuring the network device in accordance with the geographic location information through a network administrative user interface.**

As stated in column 4, lines 38 through 40 of *Hougaard*, the invention taught by *Hougaard* is directed to managing, organizing and retrieving geographic and other data. No portion of *Hougaard* address, talks about, or even hints at configuring a network or network devices, or **configuring the network device in accordance with the geographic location information through a network administrative user interface.** Therefore, *Hougaard* fails to teach the feature of **configuring the network device in accordance with the geographic location information through a network administrative user interface.** Further, as *Hougaard* does not address the issue of configuring the network device in accordance with the geographic location information, *Hougaard* also fails to suggest the feature of **configuring the network device in accordance with the geographic location information through a network administrative user interface.**

For at least the reasons set forth above, *Hougaard* fails to solve the deficiencies of *Liming* in regards to claim 1. Therefore, the proposed combination of *Liming* and *Hougaard*, when considered as a whole, does not teach or suggest all of the features of claim 1. For this reason, the proposed combination of *Liming* in view of *Hougaard* fails to render obvious claim 1. Furthermore, as claim 1 is representative of claims 18 and 35, the distinctions between claim 1 and the proposed combination of *Liming* in view of *Hougaard* apply to claims 18 and 35. Therefore, the proposed combination of *Liming* in view of *Hougaard* fails to render obvious claims 18 and 35. Additionally, claims 2-14, 19-31, 36, and 37 depend from claims 1, 18 and 35. Accordingly, no *prima facie* obviousness rejection can be stated against claims 1-14, 18-31, and 35-37. Additionally, claims 2-14, 19-31, 36, and 37 disclose other features not taught or suggested by the combination of *Liming* in view of *Hougaard*. For example, claims 3-6, 10-14, 20-23, 27-31, and 37 all recite features that are not taught or suggested by the combination of *Liming* in view of *Hougaard*. Accordingly, the rejection of claims 1-14, 18-31, and 35-37 under 35 U.S.C. § 103 has been overcome.

II. Conclusion

It is respectfully urged that the subject application is patentable over *Liming* in view of *Hougaard* and is now in condition for allowance.

The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

DATE: July 13, 2007

Respectfully submitted,

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